

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 04-10581-PBS

|                               |   |
|-------------------------------|---|
| YVETTE LOCKHART-BEMBERY,      | ) |
| Plaintiff                     | ) |
| VS.                           | ) |
|                               | ) |
| TOWN OF WAYLAND POLICE        | ) |
| DEPARTMENT, ROBERT IRVING     | ) |
| In his capacity as CHIEF OF   | ) |
| THE WAYLAND POLICE DEPARTMENT | ) |
| and DANIEL SAURO,             | ) |
| Defendants                    | ) |

**MOTION FOR SUMMARY JUDGMENT OF DEFENDANTS,**  
**TOWN OF WAYLAND POLICE DEPARTMENT, ROBERT IRVING**  
**IN HIS CAPACITY AS CHIEF OF THE WAYLAND**  
**POLICE DEPARTMENT AND DANIEL SAURO**

Defendants, TOWN OF WAYLAND POLICE DEPARTMENT, ROBERT IRVING in his capacity as CHIEF OF THE WAYLAND POLICE DEPARTMENT and DANIEL SAURO, move this Honorable Court for summary judgment pursuant to Federal Rules of Civil Procedure, Rule 56(b) on all Counts of the plaintiff's Complaint. The defendants submit the following Statement of Undisputed Material Facts and Memorandum of Law in support of this Motion.

Respectfully submitted,

The Defendants, Town of Wayland, Daniel Sauro, and  
Robert Irving  
By their attorneys,

/s/ Jeremy I. Silverfine  
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Date: July 8, 2005